

Pro Se 7 (Rev. 12/16) Complaint for Employment Discrimination

## UNITED STATES DISTRICT COURT

for the

Northern District of Georgia



Atlanta Division

FILED IN CLERK'S OFFICE  
U.S.D.C. - Atlanta

DEC 05 2024

KEVIN P. WEIMER, Clerk  
By: *[Signature]* Deputy Clerk

Mollie Lawrence

Case No.

1:24-CV-5571

(to be filled in by the Clerk's Office)

## Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Diageo North America

## Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

## COMPLAINT FOR EMPLOYMENT DISCRIMINATION

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Mollie Lawrence
Street Address	982 Viscount Ct
City and County	Avondale Estates, Dekalb
State and Zip Code	GA 30002
Telephone Number	770-846-0012
E-mail Address	mlawrence9088@gmail.com

## B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Pro Se 7 (Rev. 12/16) Complaint for Employment Discrimination

## Defendant No. 1

Name	Diageo North America
Job or Title ( <i>if known</i> )	
Street Address	175 Greenwich St, 41st Floor
City and County	New York, New York
State and Zip Code	NY 10007
Telephone Number	(212) 202-1800
E-mail Address ( <i>if known</i> )	

## Defendant No. 2

Name	
Job or Title ( <i>if known</i> )	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address ( <i>if known</i> )	

## Defendant No. 3

Name	
Job or Title ( <i>if known</i> )	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address ( <i>if known</i> )	

## Defendant No. 4

Name	
Job or Title ( <i>if known</i> )	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address ( <i>if known</i> )	

**C. Place of Employment**

The address at which I sought employment or was employed by the defendant(s) is

Name	Diageo North America
Street Address	175 Greenwich St, 41st Floor
City and County	New York, New York
State and Zip Code	NY 10007
Telephone Number	(212) 202-1800

**II. Basis for Jurisdiction**

This action is brought for discrimination in employment pursuant to (*check all that apply*):

Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender, religion, national origin).

*(Note: In order to bring suit in federal district court under Title VII, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)*

Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 to 634.

*(Note: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file a charge with the Equal Employment Opportunity Commission.)*

Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 to 12117.

*(Note: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)*

Other federal law (*specify the federal law*):

Relevant state law (*specify, if known*):

Relevant city or county law (*specify, if known*):

**III. Statement of Claim**

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

**A. The discriminatory conduct of which I complain in this action includes (check all that apply):**

- Failure to hire me.
- Termination of my employment.
- Failure to promote me.
- Failure to accommodate my disability.
- Unequal terms and conditions of my employment.
- Retaliation.
- Other acts (specify): Sexual Harassment, Sexually Hostile Work Environment

*(Note: Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court under the federal employment discrimination statutes.)*

**B. It is my best recollection that the alleged discriminatory acts occurred on date(s)**

October 2023 - June 2024

**C. I believe that defendant(s) (check one):**

- is/are still committing these acts against me.
- is/are not still committing these acts against me.

**D. Defendant(s) discriminated against me based on my (check all that apply and explain):**

- race \_\_\_\_\_
- color \_\_\_\_\_
- gender/sex \_\_\_\_\_
- religion \_\_\_\_\_
- national origin \_\_\_\_\_
- age (year of birth) \_\_\_\_\_ (*only when asserting a claim of age discrimination.*)
- disability or perceived disability (specify disability) \_\_\_\_\_

**E. The facts of my case are as follows. Attach additional pages if needed.**

**Pro Se 7 (Rev. 12/16) Complaint for Employment Discrimination**

I was sexually harassed and sexually assaulted by my manager at Diageo. After reporting the incident to HR, a retaliatory investigation was launched against me violating Title VII. Details are in the attached charge and Statement of Claim.

---

*(Note: As additional support for the facts of your claim, you may attach to this complaint a copy of your charge filed with the Equal Employment Opportunity Commission, or the charge filed with the relevant state or city human rights division.)*

**IV. Exhaustion of Federal Administrative Remedies**

A. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission or my Equal Employment Opportunity counselor regarding the defendant's alleged discriminatory conduct on (date)  
3/9/2024

---

B. The Equal Employment Opportunity Commission (check one):

has not issued a Notice of Right to Sue letter.  
 issued a Notice of Right to Sue letter, which I received on (date) 09/18/2024

*(Note: Attach a copy of the Notice of Right to Sue letter from the Equal Employment Opportunity Commission to this complaint.)*

C. Only litigants alleging age discrimination must answer this question.

Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding the defendant's alleged discriminatory conduct (check one):

60 days or more have elapsed.  
 less than 60 days have elapsed.

**V. Relief**

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

I am seeking \$300,000 in compensatory damages and punitive damages in an amount to be determined by the court, sufficient to punish the defendant for its wrongful conduct to deter similar future conduct.

---

**VI. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 12/03/2024

Signature of Plaintiff



Printed Name of Plaintiff

Mollie Lawrence

**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney

---

Printed Name of Attorney

---

Bar Number

---

Name of Law Firm

---

Street Address

---

State and Zip Code

---

Telephone Number

---

E-mail Address

---

## **Statement of Claim**

Mollie Lawrence v Diageo North America

### **Beginning of Employment, January 2022 to October 15th**

- I experienced repeated and escalating inappropriate conduct, including invasions of personal space, unwanted touching (e.g., above my knee during a one-on-one dinner discussing my career), and inappropriate personal questions about my marriage with insinuations of marital problems. While I was initially uncertain, confused, and second-guessing myself – I suspected sinister motives.

### **October 16th**

- At the Guinness Open Gate Brewery in Chicago, Douglas Howell approached me in a crowded room. After a brief, appropriate side hug, he forcibly grabbed me in a bear hug, pulled me into him, and pressed his lips near my mouth for 2–3 seconds. This occurred in front of clients and coworkers.
- That night, I reported the incident to Human Resources (HR) through the appropriate channel. HR Director Ashley Beiter provided no guidance on how to move forward other than suggesting I take the day off.
- After receiving no clarity, I spoke with Keara Funck, VP of Sales for Diageo North America. She allowed me to take vacation and personal days to avoid interacting with Douglas Howell. Once my allotted days were exhausted, I was placed on an "understood leave" during an investigation, which extended beyond the promised 60 days to 113 days.

### **October 16th to February 2024**

- During the 113-day investigation, I was unable to perform my sales duties, directly impacting my bonus structure. Douglas Howell continued to work as usual. • At the conclusion of the investigation, I was informed that my claim was "unsubstantiated."

### **February 9th**

- Diageo contacted me about an allegation against me for breach of conduct. Former employee Kevin Freeman warned me that Douglas Howell was retaliating against me. • Kevin Freeman also notified me that Douglas Howell was spreading rumors that my husband was beating me and instructing me to use the Diageo credit card for nefarious activities. None of which is true.

### **February 16th - March 29th**

- I met with Carlos Zamudio, Director of Business Integrity, who reports to the CFO of Diageo North America.

- I asked to record the initial meeting, he declined. The initial meeting was hostile. After I insisted on recording future meetings, the tone changed.
- I was forced to supply extensive proof to refute the allegations during 4 separate interviews. Despite providing evidence showing I complied with the fleet policy, Carlos presented misleading claims to the Conduct Review Committee.
- After forwarding my concerns to the VP of HR, Carlos abruptly withdrew from the matter. I received a vague verbal warning regarding alleged violations of the "fleet policy" and "code of business conduct," but no specifics were provided.

#### **April - June 14th, 2024**

- I asked HR Director Ashley Beiter how to handle future events where Douglas Howell would be present. Ashley advised me to "sit on the other side of the room." This response demonstrated that Diageo was enabling Douglas Howell's harassment.
- Co-workers would ignore my phone calls, actively removed me from email lists, and left me off of emails with pertinent information, making it difficult to do my job. ● After months of feeling unsupported and unsafe, I submitted my two-week notice.

#### **June 27th**

- I was asked to help train my replacement, Audrey Stone, who had been hired before I submitted my notice. This suggested Diageo anticipated or orchestrated my departure earlier.



## U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

Atlanta District Office

100 Alabama Street, SW, Suite 4R30

Atlanta, GA 30303

1-800-669-4000

Website: [www.eeoc.gov](http://www.eeoc.gov)

### **DISMISSAL AND NOTICE OF RIGHTS**

(This Notice replaces EEOC FORMS 161, 161-A & 161-B)

Issued On: 09/18/2024

**To:** Mollie Lawrence  
982 Viscount Court Avondale Estates  
Avondale Est, GA 30002  
Charge No: 410-2024-04729

EEOC Representative and email: STEVEN GARCIA-REYES  
Senior Federal Investigator  
[steven.garcia-reyes@eeoc.gov](mailto:steven.garcia-reyes@eeoc.gov)

---

### **DISMISSAL OF CHARGE**

The EEOC has granted your request that the agency issue a Notice of Right to Sue, where it is unlikely that EEOC will be able to complete its investigation within 180 days from the date the charge was filed.

The EEOC is terminating its processing of this charge.

### **NOTICE OF YOUR RIGHT TO SUE**

This is official notice from the EEOC of the dismissal of your charge and of your right to sue. If you choose to file a lawsuit against the respondent(s) on this charge under federal law in federal or state court, **your lawsuit must be filed WITHIN 90 DAYS of your receipt of this notice**. Receipt generally occurs on the date that you (or your representative) view this document. You should keep a record of the date you received this notice. Your right to sue based on this charge will be lost if you do not file a lawsuit in court within 90 days. (The time limit for filing a lawsuit based on a claim under state law may be different.)

If you file a lawsuit based on this charge, please sign in to the EEOC Public Portal and upload the court complaint to charge 410-2024-04729.

On behalf of the Commission,

Digitally Signed By: Darrell E. Graham  
09/18/2024

---

Darrell E. Graham  
District Director

**Cc:**

Paul Mancini  
Diageo North America  
3 WORLD TRADE CTR 175 GREENWICH ST 42ND FLOOR  
New York, NY 10007

Jack Malley  
733 Yonkers Avenue, Suite 200  
Yonkers, NY 10704

Edward D Buckley  
Buckle Beal, LLP.  
600 Peachtree Street, Suite 3900  
Atlanta, GA 30308

Please retain this notice for your records.

Enclosure with EEOC Notice of Closure and Rights (01/22)

## **INFORMATION RELATED TO FILING SUIT UNDER THE LAWS ENFORCED BY THE EEOC**

*(This information relates to filing suit in Federal or State court under Federal law. If you also plan to sue claiming violations of State law, please be aware that time limits may be shorter and other provisions of State law may be different than those described below.)*

### **IMPORTANT TIME LIMITS – 90 DAYS TO FILE A LAWSUIT**

If you choose to file a lawsuit against the respondent(s) named in the charge of discrimination, you must file a complaint in court **within 90 days of the date you receive this Notice**. Receipt generally means the date when you (or your representative) opened this email or mail. You should **keep a record of the date you received this notice**. Once this 90-day period has passed, your right to sue based on the charge referred to in this Notice will be lost. If you intend to consult an attorney, you should do so promptly. Give your attorney a copy of this Notice, and the record of your receiving it (email or envelope).

If your lawsuit includes a claim under the Equal Pay Act (EPA), you must file your complaint in court within 2 years (3 years for willful violations) of the date you did not receive equal pay. This time limit for filing an EPA lawsuit is separate from the 90-day filing period under Title VII, the ADA, GINA, the ADEA, or the PWFA referred to above. Therefore, if you also plan to sue under Title VII, the ADA, GINA, the ADEA or the PWFA, in addition to suing on the EPA claim, your lawsuit must be filed within 90 days of this Notice and within the 2- or 3-year EPA period.

Your lawsuit may be filed in U.S. District Court or a State court of competent jurisdiction. Whether you file in Federal or State court is a matter for you to decide after talking to your attorney. You must file a "complaint" that contains a short statement of the facts of your case which shows that you are entitled to relief. Filing this Notice is not enough. For more information about filing a lawsuit, go to <https://www.eeoc.gov/employees/lawsuit.cfm>.

### **ATTORNEY REPRESENTATION**

For information about locating an attorney to represent you, go to:  
<https://www.eeoc.gov/employees/lawsuit.cfm>.

In very limited circumstances, a U.S. District Court may appoint an attorney to represent individuals who demonstrate that they are financially unable to afford an attorney.

### **HOW TO REQUEST YOUR CHARGE FILE AND 90-DAY TIME LIMIT FOR REQUESTS**

There are two ways to request a charge file: 1) a Freedom of Information Act (FOIA) request or 2) a "Section 83" request. You may request your charge file under either or both procedures. EEOC can generally respond to Section 83 requests more promptly than FOIA requests.

Since a lawsuit must be filed within 90 days of this notice, please submit your FOIA and/or Section 83 request for the charge file promptly to allow sufficient time for EEOC to respond and for your review.

**To make a FOIA request for your charge file**, submit your request online at <https://eeoc.arkcase.com/foia/portal/login> (this is the preferred method). You may also submit a FOIA request for your charge file by U.S. Mail by submitting a signed, written request identifying your request as a "FOIA Request" for Charge Number 410-2024-04729 to the

Enclosure with EEOC Notice of Closure and Rights (01/22)

District Director at Darrell E. Graham, 100 Alabama Street, SW Suite 4R30, Atlanta, GA 30303.

**To make a Section 83 request for your charge file**, submit a signed written request stating it is a "Section 83 Request" for Charge Number 410-2024-04729 to the District Director at Darrell E. Graham, 100 Alabama Street, SW Suite 4R30, Atlanta, GA 30303.

You may request the charge file up to 90 days after receiving this Notice of Right to Sue. After the 90 days have passed, you may request the charge file only if you have filed a lawsuit in court and provide a copy of the court complaint to EEOC.

For more information on submitting FOIA requests, go to  
<https://www.eeoc.gov/eeoc/foia/index.cfm>.

For more information on submitted Section 83 requests, go to <https://www.eeoc.gov/foia/section-83-disclosure-information-charge-files>.

## CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974; see Privacy Act Statement on reverse side before completing this form.

ENTER CHARGE NUMBER

FEPA  
 EEOC

410-2024-04729

and EEOC

(State or local agency, if any)

NAME (Indicate Mr., Ms., or Mrs.)

Ms. Mollie Lawrence

RECEIVED AT ATDO  
EEOC ON 3/9/2024

Home Telephone No.

(770) 846-0012

STREET ADDRESS

CITY, STATE AND ZIP CODE (COUNTY)

982 Viscount Court Avondale Estates, Georgia 30002 (DeKalb)

D.O.B. (if age claim)

NAME IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (*If more than one list below.*)

NAME

Diageo

NO. EMPLOYEES/MEMBERS  
500+TELEPHONE NUMBER  
(212) 202-1800

STREET ADDRESS

CITY, STATE AND ZIP CODE

3 World Trade Center, 175 Greenwich St, New York, New York 10007

CAUSE OF DISCRIMINATION BASED ON (*Check appropriate box(es)*)

RACE  COLOR  SEX  RELIGION  NATIONAL ORIGIN  
 RETALIATION  AGE  DISABILITY  GENETIC INFORMATION  
 X OTHER (Specify) sexual harassment, sexually hostile working environment

DATE MOST RECENT OR CONTINUING DISCRIMINATION

TOOK PLACE (*Month, day, year*)**Continuing Discrimination  
and Retaliation**

- I. My name is Mollie Lawrence. I started work as a Distributor Manager for Diageo Beer, the beer division of Diageo, which is a global company, on January 24, 2022. Douglas Howell is a Director and is my direct supervisor. On or about October 16, 2023, at a sales event at Diageo's Guiness Brewery, Howell approached me in a crowded room and gave me a side hug but then grabbed me with both arms, like a bear hug, and subjected me to an unwanted kiss in front of many people. While grabbing me, he forcibly pressed his lips near my mouth for 2 to 3 seconds. I was shocked and extremely uncomfortable. Howell had made me uncomfortable before, including invading my personal space, giving my unwanted, awkward hugs, touching my knee, creating opportunities to spend time with me, and asking inappropriate personal questions, but this aggressive kiss was particularly disturbing.
- II. I immediately reported the incident to Human Resources but was told an investigation could take up to 60 days. My job involves daily communication through email, text, and phone with Howell. In order to avoid him, I was forced to take time off from work, as the company refused to take action to protect me from interacting with Howell. Due to the company's failure to protect me from further harassment and retaliation, I have now had to remain out of work for over 110 days, while Howell has, to my knowledge, been allowed to continue to work.
- III. I have recently learned that Howell has been allowed to retaliate against me, including falsely claiming to other employees that I have improperly used my company credit card and that my husband was involved in my alleged misuse of the card and is physically abusive. These allegations are false, harmful, defamatory, and retaliatory. Diageo has turned the investigation into my complaints into a retaliatory effort to find wrongdoing on my part. In addition, human resources told me that if I was unhappy with their investigation, I should look into short term disability. When I looked at the process for filing such a claim, I accidentally submitted a claim. I immediately called the carrier and told them it was a mistake. I told the company and carrier that I was not seeking disability benefits. I was told the claim was withdrawn but I continued to receive inquiries about it.
- IV. I have been subjected to sexual harassment, a sexually hostile working environment, sex discrimination, and retaliation for my protected complaints in violation of Title VII of the Civil Rights Act of 1964.

I also want this charge filed with the EEOC. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

NOTARY - (When necessary to meet State and Local Requirements)

I declare under penalty of perjury that the foregoing is true and correct.

Date Charging Party (Signature)

2/9/2024

— DocuSigned by:  
**Mollie Lawrence**  
3185AA4B876F43B

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

#### PRIVACY ACT STATEMENT

(This form is covered by the Privacy Act of 1974, Public Law 93-579: Authority for requesting the personal data and the uses are given below.)

1. FORM NUMBER/TITLE/DATE. EEOC Form 5, CHARGE OF DISCRIMINATION, March 1984.
2. AUTHORITY. 42 U.S.C. § 2000e-5(b), 29 U.S.C. §211, 29 U.S.C. § 626.
3. PRINCIPAL PURPOSE (S). The purpose of the charge, whether recorded initially on this form or in some other way reduced to writing and later recorded on this form, is to invoke the jurisdiction of the Commission.
4. ROUTINE USES. This form is used to determine the existence of facts which fall within the Commission's jurisdiction to investigate, determine, conciliate and litigate charges of unlawful employment practice. Information provided on this form will be used by Commission employees to guide the Commission's investigatory activities. This form may be disclosed to other State, local and federal agencies as may be appropriate or necessary to carrying out the Commission's functions. A copy of this charge will ordinarily be served upon the person against whom the charge is made.
5. WHETHER DISCLOSURE IS MANDATORY OR VOLUNTARY AND EFFECT ON INDIVIDUAL FOR NOT PROVIDING INFORMATION. Charges must be in writing and should identify the parties and action or policy complained of. Failure to have a charge which identifies the parties in writing may result in the Commission not accepting the charge. Charges under Title VII must be sworn to or affirmed. Charges under the ADEA should ordinarily be signed. Charges may be clarified or amplified later by amendment. It is not mandatory that this form be used to provide the requested information.
6. [ ] Under Section 706 of Title VII of the Civil Rights Act of 1964, as amended, this charge will be deferred to and will be processed by the State or local agency indicated. Upon completion of the agency's processing, you will be notified of its final resolution in your case. If you wish EEOC to give Substantial Weight Review to the agency's findings, you must send us a request to do so, in writing, within fifteen (15) days of your receipt of the agency's finding. Otherwise, we will adopt the agency's finding as EEOC's and close your case.

#### NOTICE OF NON-RETALIATION REQUIREMENTS

Section 704(a) of the Civil Rights Act of 1964, as amended, and Section 4(d) of the Age Discrimination in Employment Act of 1967, as amended, state:

It shall be an unlawful employment practice for an employer to discriminate against any of his employees or applicants for employment, for an employment agency to discriminate against any individual, or for a labor organization to discriminate against any member thereof or applicant for membership, because he has opposed a practice made an unlawful employment practice by this title or because he has made a charge, testified, assisted, or participated in any manner in an investigation, proceeding, or hearing under this title.

The Equal Pay Act of 1963 contains similar provisions. Persons filing charges of discrimination are advised of these Non-Retaliation Requirements and are instructed to notify EEOC if any attempt at retaliation is made.

**AMENDED CHARGE OF DISCRIMINATION**

This form is affected by the Privacy Act of 1974; see Privacy Act Statement on reverse side before completing this form.

ENTER CHARGE NUMBER

 FEPA EEOC Charge No. 410-2024-04729

and EEOC

(State or local agency, if any)

NAME (Indicate Mr., Ms., or Mrs.) <b>Ms. Mollie Lawrence</b>	RECEIVED AT ATDO EEOC ON 4/30/2024	Home Telephone No. <b>(770) 846-0012</b>
STREET ADDRESS <b>982 Viscount Court</b>	CITY, STATE AND ZIP CODE (COUNTY) <b>Avondale Estates, Georgia 30002 (DeKalb)</b>	D.O.B. (if age claim)

NAME IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (*If more than one list below.*)

NAME <b>Diageo</b>	NO. EMPLOYEES/MEMBERS <b>500+</b>	TELEPHONE NUMBER <b>(212) 202-1800</b>
-----------------------	--------------------------------------	---

STREET ADDRESS <b>3 World Trade Center, 175 Greenwich St</b>	CITY, STATE AND ZIP CODE <b>New York, New York 10007</b>
---	---

CAUSE OF DISCRIMINATION BASED ON ( <i>Check appropriate box(es)</i> ) <input type="checkbox"/> RACE <input type="checkbox"/> COLOR <input type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input type="checkbox"/> NATIONAL ORIGIN <input checked="" type="checkbox"/> RETALIATION <input type="checkbox"/> AGE <input type="checkbox"/> DISABILITY <input type="checkbox"/> GENETIC INFORMATION <input checked="" type="checkbox"/> OTHER (Specify) sexual harassment, sexually hostile work environment, retaliatory hostile work environment	DATE MOST RECENT OR CONTINUING DISCRIMINATION TOOK PLACE ( <i>Month, day, year</i> )  <b>Continuing Discrimination and Retaliation</b>
--	--

- I. My name is Mollie Lawrence. This amends my prior EEOC Charge of Discrimination, Charge No. 410-2024-04729, filed on February 9, 2024. In addition to the discriminatory and retaliatory treatment detailed in my initial Charge, Diageo has subjected me to further discrimination and retaliation and to a retaliatory hostile work environment. I am still employed as a Distributor Manager, but it appears that Diageo is attempting to push me out.
- II. As detailed in my initial Charge, my supervisor Douglas Howell grabbed me with both arms and subjected me to an unwanted kiss in front of many people. I immediately reported the incident to Human Resources ("HR"). In order to avoid Howell, I was forced to take time off from work during HR's investigation, while Howell, to my knowledge, was allowed to continue to work. Diageo turned the alleged investigation into my complaints into a retaliatory effort to find wrongdoing on my part. Other female employees have had similar retaliatory experiences with Diageo HR after complaining about male supervisors. Unsurprisingly, HR's sham investigation found that my sexual harassment complaint was "unsubstantiated," even though the unwanted kiss occurred in a room full of people. Then, based on false claims made about me by Howell, Diageo conducted a full-blown retaliatory investigation into me, alleging I had improperly used my company credit card. Diageo treated Howell as innocent and did not attempt to prove him guilty but treated me as guilty until proven innocent. Until I proved my innocence, I had to finance Diageo expenditures up front with my personal money. It is apparent that Diageo has a practice of siding with male supervisors and retaliating against female employees who complain about them, in an effort to push out the women who complain. I believe they are using this tactic to try to force me to quit.
- III. Diageo's treatment of me, in comparison to its treatment of Howell, has been discriminatory and retaliatory since I submitted my first internal report, as well as since I filed my initial Charge. Recently, Diageo did finally transfer me to a different supervisor, but it has treated me like this was all somehow my fault, and the discriminatory and retaliatory sham investigations have shown that I will never be treated fairly. I have never been given any assurance that I will be able to advance in my career free from retaliation or that Diageo wants me to remain employed. I have been subjected to sexual harassment, a sexually hostile work environment, sex discrimination, retaliation, and a retaliatory hostile work environment, all in violation of Title VII of the Civil Rights Act of 1964.

I also want this charge filed with the EEOC. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

NOTARY - (When necessary to meet State and Local Requirements)

I declare under penalty of perjury that the foregoing is true and correct.

Date                    Charging Party (Signature)

4/30/2024

DocuSigned by:

3185A44B876F43B

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

PRIVACY ACT STATEMENT

(This form is covered by the Privacy Act of 1974, Public Law 93-579: Authority for requesting the personal data and the uses are given below.)

1. FORM NUMBER/TITLE/DATE. EEOC Form 5, CHARGE OF DISCRIMINATION, March 1984.
2. AUTHORITY. 42 U.S.C. § 2000e-5(b), 29 U.S.C. §211, 29 U.S.C. § 626.
3. PRINCIPAL PURPOSE (S). The purpose of the charge, whether recorded initially on this form or in some other way reduced to writing and later recorded on this form, is to invoke the jurisdiction of the Commission.
4. ROUTINE USES. This form is used to determine the existence of facts which fall within the Commission's jurisdiction to investigate, determine, conciliate and litigate charges of unlawful employment practice. Information provided on this form will be used by Commission employees to guide the Commission's investigatory activities. This form may be disclosed to other State, local and federal agencies as may be appropriate or necessary to carrying out the Commission's functions. A copy of this charge will ordinarily be served upon the person against whom the charge is made.
5. WHETHER DISCLOSURE IS MANDATORY OR VOLUNTARY AND EFFECT ON INDIVIDUAL FOR NOT PROVIDING INFORMATION. Charges must be in writing and should identify the parties and action or policy complained of. Failure to have a charge which identifies the parties in writing may result in the Commission not accepting the charge. Charges under Title VII must be sworn to or affirmed. Charges under the ADEA should ordinarily be signed. Charges may be clarified or amplified later by amendment. It is not mandatory that this form be used to provide the requested information.
6. [ ] Under Section 706 of Title VII of the Civil Rights Act of 1964, as amended, this charge will be deferred to and will be processed by the State or local agency indicated. Upon completion of the agency's processing, you will be notified of its final resolution in your case. If you wish EEOC to give Substantial Weight Review to the agency's findings, you must send us a request to do so, in writing, within fifteen (15) days of your receipt of the agency's finding. Otherwise, we will adopt the agency's finding as EEOC's and close your case.

NOTICE OF NON-RETALIATION REQUIREMENTS

Section 704(a) of the Civil Rights Act of 1964, as amended, and Section 4(d) of the Age Discrimination in Employment Act of 1967, as amended, state:

It shall be an unlawful employment practice for an employer to discriminate against any of his employees or applicants for employment, for an employment agency to discriminate against any individual, or for a labor organization to discriminate against any member thereof or applicant for membership, because he has opposed a practice made an unlawful employment practice by this title or because he has made a charge, testified, assisted, or participated in any manner in an investigation, proceeding, or bearing under this title.

The Equal Pay Act of 1963 contains similar provisions. Persons filing charges of discrimination are advised of these Non-Retaliation Requirements and are instructed to notify EEOC if any attempt at retaliation is made.